

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'	)	
CONCUSSION INJURY LITIGATION	)	No. 2:12-md-2323-AB
<hr/>	)	
	)	MDL No. 2323
THIS DOCUMENT RELATES TO:	)	
ALL ACTIONS	)	
	)	
	)	

**MOTION TO ENJOIN FLORIDA ACTION PURSUANT TO ALL WRITS ACT**

Special Masters Wendell E. Pritchett, Jo-Ann M. Verrier, and David Hoffman (“the Special Masters”) are named defendants in an action filed by Collins & Truett Attorneys, P.A. (a firm that represents class members in the above-captioned matter) on June 17, 2021 in the Circuit Court for the Second Judicial District, in and for Leon County, Florida, which has been removed to the U.S. District Court for the Northern District of Florida, No. 4:21-cv-00286-RH-MAF. Because the Florida action seeks an injunction “protecting” certain documents from discovery and use in an audit process expressly approved by this Court, the Special Masters hereby respectfully move the Court for an injunction of that Florida action.

Under the provisions of the Settlement Agreement and the Court’s April 22, 2015 Final Order and Judgment approving the Settlement, this Court was vested with exclusive jurisdiction and authority over the Parties and their counsel and the Special Masters, as well as the interpretation, implementation, administration, and enforcement of the NFL Settlement. With the filing of the Florida action, the Court’s autonomy over the Settlement and key participants in the Settlement process is threatened and its jurisdiction cast in doubt.

The All Writs Act, 28 U.S.C. § 1651, vests this Court with the authority to take necessary action to protect its jurisdiction. The Act has routinely been interpreted as barring actions that, if

allowed to proceed, would undermine federal court jurisdiction and frustrate orders issued by the federal courts. The Florida action is one such court action, and the Court should invoke the All Writs Act to stop it.

WHEREFORE, for these reasons, and for those set forth more fully in the accompanying memorandum of law, Special Masters Pritchett, Verrier, and Hoffman request that the Court enjoin the Florida action, and issue any other relief as it deems just and appropriate.

Respectfully submitted,

/s/ Dennis R. Suplee

Dennis R. Suplee (I.D. No. 03336)  
Theresa E. Loscalzo (I.D. No. 52031)  
Lee C. Schmeer (I.D. No. 318849)  
Schnader Harrison Segal & Lewis LLP  
1600 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 751-2068  
Facsimile: (215) 751-2205  
dsuplee@schnader.com  
tloscalzo@schnader.com  
lschmeer@schnader.com  
*Counsel for Wendell E. Pritchett, Jo-Ann M.  
Verrier, and David Hoffman*

Dated: July 14, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of July, 2021, the foregoing Motion to Enjoin Florida Action Pursuant to All Writs Act, as well as the supporting memorandum of law and exhibit, was electronically filed and served upon all parties of record and is available for viewing and downloading via the Court's ECF system, and that the foregoing document also was delivered via first class mail to:

Richard B. Collins, Esquire  
Collins & Truett Attorney, P.A.  
113 South Monroe Street  
Tallahassee, Florida 32301

/s/ Lee C. Schmeer